



Joseph B. Clifford, D.C.

404 East Broad Street ■ Cookeville, Tennessee 38501 ■ (615) 528-7374

0626 '99 JUL 19 P3:12

July 14, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville MD 20852

Re: Docket No. 98N-1038,
"Irradiation in the Production, Processing, and Handling of Food"

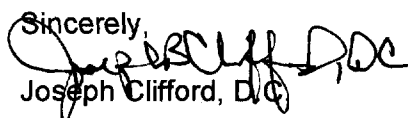
To whom it may concern:

I fully oppose manufactures irradiating our foodstuffs, and refuse to purchase these materials. The whole concept is totally irrational. It has become well known that irradiation destroys vitamins and causes changes in sensory and spoilage qualities that are not obvious or expected by the consumer.

Irradiation creates a new class of unique Radiolytic products that have never been tested for the possible carcinogenic effects on humans. The irradiation process creates new volumes of radioactive waste from Cobalt-60 and Cesium-137 which will plague our nation; exposing workers to toxic radionuclides, when we haven't a clue as to what to do with the nuclear waste we already have.

Unfortunately, using radiation on food has already been approved by the FDA, thanks to congressional pressure from Agribusiness and the Nuclear Industry. I am extremely concerned about the prospect of weakening the labeling requirements for irradiated food. Any foods, or any foods containing ingredients that have been treated by irradiation, should be clearly labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the radura, the international symbol of irradiated food. If the food is not packaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like other labels, irradiation labels are required by the FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling. I recognize the radura as information regarding a material fact of food processing. The requirement for irradiation disclosure (both label and radura) should not expire at any time in the future. The material fact of processing remains. Even if some consumers become familiar with the radura, new consumers (e.g., young people, and immigrants) will not be. The symbol should be clearly understandable at the point of purchase for everyone. If there is no label, consumers will be misled into believing the food has not been irradiated.

Sincerely,

Joseph Clifford, D.C.

98N 1038

C4215

Joseph B. Clifford, D.C.
404 E. Broad Street
Cookeville, TN 38501



Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville MD 20852

20852 / 0001

